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2 Including Professional Corporations
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WHOLESALE CORPORATION
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10 UNITED STATES DISTRICT COURT
11 CENTRAL DISTRICT OF CALIFORNIA
12

13 JASMINE RAMIREZ,

14 Plaintiff,

15 v.

16 COSTCO WHOLESALE
CORPORATION, a
17 Washington Corporation; and DOES 1
through 5,
18 inclusive,

19 Defendants.
20

Case No. 2:23-cv-3780

[Orange County Superior Court Case
No. 30-2023-01318756-CU-OE-CJC

**DECLARATION OF TRAVIS J.
ANDERSON IN SUPPORT OF
DEFENDANT'S NOTICE OF
REMOVAL OF CIVIL ACTION TO
THE UNITED STATES DISTRICT
COURT FOR THE CENTRAL
DISTRICT OF CALIFORNIA**

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DECLARATION OF TRAVIS J. ANDERSON

I, Travis J. Anderson, state and declare as follows:

1. I am an attorney with the law firm of Sheppard, Mullin, Richter & Hampton LLP, attorneys of record for defendant Costco Wholesale Corporation (“Costco”). I have been involved with the defense of this case since its inception. I have personal knowledge of the facts stated herein, and if called as a witness to testify thereto, I could competently do so.

2. A true and correct copy of Plaintiff Jasmine Ramirez’s (“Plaintiff”) Complaint, Civil Case Cover Sheet, and Summons, filed in Orange County Superior Court on April 11, 2023, are attached hereto as **Exhibit A**. I am informed and believe that these documents were served on Costco on April 18, 2023, by process server to John Sullivan, Costco’s Corporate Counsel, at Costco’s headquarters in Issaquah, Washington. A true and correct copy of the proof of service is attached hereto as **Exhibit B**.

3. A true and correct copy of a page from the website of the Orange County Superior Court is attached hereto as Exhibit C. I personally accessed and printed **Exhibit C**. Exhibit C appears to list all of the documents filed with the Superior Court pertaining to this matter, with the exception of Costco’s Answer, filed on May 15, 2023.

4. Attached hereto as **Exhibit D** are true and correct copies of all of the documents listed as part of the Superior Court’s file as set forth in Exhibit C, with the exception that the Complaint is attached to this Declaration separately as Exhibit A. Exhibit D also includes a copy of Costco’s Answer that was submitted for filing on May 15, 2023.

1 5. Plaintiff's Complaint contains two causes of action for gender/sex and
2 pregnancy discrimination. Among other things, Plaintiff's Complaint seeks lost
3 earnings, interest, compensation for emotional distress, punitive damages, and
4 attorneys' fees.

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6 6. As detailed in the concurrently-filed Declaration of Sarah Rajski,
7 Plaintiff's hourly rate as of April 30, 2022, the date she began her leave of absence,
8 was \$22.00, and Plaintiff was a full time employee at the time she began her leave.
9 Prior to going on leave, Plaintiff typically worked between 55 and 75 hours every
10 two weeks. Taking a very conservative average of 30 hours per week, Plaintiff's
11 pay translates into approximately \$34,320 per year. Assuming Plaintiff remained a
12 full time employee from May through October 2022, the time she alleges she was
13 involuntarily placed on an unpaid leave of absence, Plaintiff's lost wages from
14 Costco would be approximately \$17,160, the equivalent of 6 months of back pay.
15 This figure does not include amounts for lost benefits, interest, emotional distress,
16 punitive damages and/or attorneys' fees (which, for amount of controversy
17 purposes, must be assumed to be recoverable by Plaintiff).

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19 7. I have practiced extensively in the area of labor and employment law
20 for over the past thirteen years. During that time, I have defended numerous claims
21 for alleged wrongful discrimination. Based upon: (1) my experience, (2) the
22 allegations contained in Plaintiff's Complaint, (3) Plaintiff's final rate of pay, and
23 (4) Plaintiff's prayer for relief (including her request for exemplary damages and
24 attorneys' fees), I believe that the amount in controversy in this case easily exceeds
25 \$75,000.

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27 8. Attached as **Exhibit E** hereto is a true and correct copy of a printout
28 from the California Secretary of State's website for Costco Wholesale Corporation.

1 As depicted in **Exhibit E**, Costco Wholesale Corporation is incorporated in the State
2 of Washington and its corporate headquarters and principal place of business is
3 located in Issaquah, Washington.

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5 I declare under penalty of perjury under the laws of the State of
6 California and the United States that the foregoing is true and correct, and that I
7 executed this declaration on May 17, 2023 in San Diego, California.

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9 /s/ Travis J. Anderson
10 TRAVIS J. ANDERSON
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